

# GREEN KAMINER MIN & ROCKMORE LLP

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January 7, 2025

**VIA ECF**

Honorable Natasha C. Merle  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Email: EMCCRD@cand.uscourts.gov

*Re: Correa Morales v. Escobar Restrepo – Extension on Consent*  
Case No. 1:24-cv-07951-NCM-TAM

Dear Judge Merle:

This firm represents the Petitioner in the above captioned Hague Convention proceeding. We write jointly with consent of Respondent's counsel to respectfully request continuance of the hearing on the petition for the above-referenced case.

On January 2, 2025, the parties jointly filed a letter, *inter alia*, seeking to reschedule the hearing on the petition to a date after January 29, 2025. [ECF No. 15]. In response to the Joint Letter Motion, the Court issued an order rescheduling trial in this matter to February 5 and 6, 2025. [Notice of Electronic Filing, dated January 2, 2025].

Unfortunately, due to a misreading of the calendar, Petitioner inadvertently did not note in the letter that his counsel is also unavailable in the first week of February. We have conferred with opposing counsel, and both sides are available during the second week of February at any time that is convenient for the Court, except for February 11th, when Mr. Min will be appearing in another trial. Pursuant to Rule I.F.1 of this Court's Individual Practice Rules, the parties note that a request for a trial adjournment has been made once before, and this request was granted. Sincere apologies for the inadvertent representation of complete availability for trial in this matter after January 29, 2025, and for any inconvenience caused to the Court.

Thank you very much for your consideration in this matter.

Very truly yours,

/s/Richard Min  
Richard Min  
Attorney for Petitioner

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cc: All Counsel (by ECF)